



The Engineered Wood Association

October 11, 2006

Mr. Dave Walls
Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95883

Re: Proposed Amendments to IBC by the California Office of State Fire Marshal

Dear Mr. Walls:

APA – The Engineered Wood Association is a trade association representing a majority of the manufacturers of engineered structural wood members in North America. As such, APA was delighted that the State of California decided to adopt the International Building Code (IBC) as it's own. The vast majority of the engineering and professional design community also greeted this decision with much enthusiasm, since it was such an important step toward a nationwide, uniform building code.

We were, however, dismayed to see what the California Office of State Fire Marshal (OSFM) proposes as “amendments” to the IBC regarding fire. These proposals don't simply amend the IBC; they rewrite it in the mold of the California Building Code. These proposals are not intended to move California's fire regulations into the 21st century, but rather, an attempt to maintain the status quo and evade compliance with the instructions from the California State Legislature.

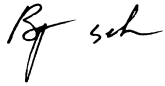
In proposing these changes to the IBC, no supporting documentation of the perceived need was given or mentioned, neither for individual changes nor for the wholesale nature of the change package. The IBC code-change process, which the OSFM proposals circumvent, requires that reasons be given for each and every proposed change to permit any interested parties to discuss the proposed changes in an open forum. This type of open forum is necessary for the development of a rational, fair, consensus-based code.

The OSFM, on the other hand, has apparently taken a biased position related to fire codes. Without reasons for the proposed changes, how are the members of the California Building Standards Commission, to whom the OSFM makes the change recommendations, supposed to make rational decisions? More importantly, how is the public supposed to know if the proposed changes are in their best interests?

Our review of fire statistics from United States Fire Administration (<http://www.usfa.dhs.gov>) shows that overall fire deaths and losses have been going steadily downward. While there are differences among the states, the reason for these differences is unclear. Until an authoritative study shows a clear correlation between the proposed code amendments and their probable effect on life and property loss, there is no good reason to arbitrarily eviscerate the nationally recognized, consensus based IBC code provisions on fire and replace them with old California Building Code language.

APA strongly urges that you do not adopt these proposed changes without extensive review of each change and public hearings on each change.

Sincerely,



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